

# **EXHIBIT 1**

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

RACHELLE COLVIN, individually and as  
 next friend of minor Plaintiff, G.D., and  
 DANIELLE SASS, individually and as next  
 friend of minor plaintiff, L.C., DAVID L.  
 GENTRY, individually and as next friend of  
 minor plaintiff, L.G., OSMANY  
 RODRIGUEZ, individually, and as next friend  
 of minor plaintiff, O.R., JOSHUA R.  
 MUNSON, individually and as next friend of  
 minor plaintiffs D.C., J.M., T.T., and R.T., and  
 LAVINA GANN, individually and as next  
 friend of minor plaintiff, S.J., and on behalf of  
 all others similarly situated,

Plaintiffs,

v.

ROBLOX CORPORATION, SATOZUKI  
 LIMITED B.V., STUDS ENTERTAINMENT  
 LTD., and RBLXWILD ENTERTAINMENT  
 LLC,

Defendants.

Case No. 3:23-cv-04146-VC

**DEFENDANT ROBLOX CORPORATION'S  
 SECOND SET OF REQUESTS FOR  
 PRODUCTION TO PLAINTIFFS**

Judge: Hon. Vince Chhabria

1 **PROPOUNDING PARTY:** **DEFENDANT ROBLOX CORPORATION**

2 **RESPONDING PARTY:** **PLAINTIFFS RACHELLE COLVIN, G.D., DANIELLE SASS, L.C.,**

3 **DAVID L. GENTRY, L.G., OSMANY RODRIGUEZ, O.R., JOSHUA R.**

4 **MUNSON, D.C., J.M., T.T., R.T., LAVINA GANN, AND S.J.**

5 **SET NUMBER:** **SECOND (REQUEST NOS. 37–48)**

6 Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendant Roblox Corporation

7 (“Roblox”) hereby requests that Plaintiffs Rachelle Colvin, G.D., Danielle Sass, L.C., David L.

8 Gentry, L.G., Osmany Rodriguez, O.R., Joshua R. Munson, D.C., J.M., T.T., R.T., Lavina Gann,

9 and S.J. (collectively, “Plaintiffs”) respond to the following Requests for Production of Documents

10 (the “Requests” and each, a “Request”) and produce for copying and inspection responsive

11 documents and things within thirty (30) days from the date this demand is served, at the offices of

12 Roblox’s counsel, Cooley LLP, 3 Embarcadero Center, 20th Floor, San Francisco, CA 94111.

### 13 **DEFINITIONS**

14 1. “ACTION” means the above-captioned case, *Colvin v. Roblox*, No. 3:23-cv-4146-

15 VC (N.D. Cal.) (“*Colvin*”), at any stage of the proceedings, including *Gentry v. Roblox*, No. 3:24-

16 cv-1593 (N.D. Cal.) prior to consolidation with *Colvin*.

17 2. “AGREEMENT” means a contract, arrangement, or understanding, formal or

18 informal, oral or written, between two or more PERSONS.

19 3. “ALL” means each and every.

20 4. “AND” or “OR” shall be construed either disjunctively or conjunctively as

21 necessary to bring within the scope of the Request all responses that might otherwise be construed

22 to be outside the scope of the Request.

23 5. “ANY” means one or more.

24 6. “COMMUNICATION(S)” is used in its broadest sense and includes but is not

25 limited to any transmission or exchange of information between two or more PERSONS, by every

26 manner or means of disclosure or transfer or exchange of information, whether orally, in writing,

27 or otherwise, and including, but not limited to, any conversation or discussion by means of letter,

1 note, memorandum, telephone, telegraph, telex, telecopier, fax transmission, cable, e-mail, or  
2 electronic or any other medium. This definition shall be construed consistent with the Federal  
3 Rules of Civil Procedure and any stipulated order concerning the Electronically Stored Information  
4 entered in this ACTION.

5 7. “COMPLAINT” means the Consolidated Class Action Complaint for Damages,  
6 ECF No. 79, as well as ANY operative complaint that PLAINTIFFS previously filed or file  
7 hereafter in this ACTION.

8 8. “DEFENDANT” means ROBLOX, Satozuki Limited B.V., Studs Entertainment  
9 Ltd., and RBLXWild Entertainment LLC, as well as any defendant named in any operative  
10 COMPLAINT filed in this ACTION hereafter.

11 9. “DEVICE” means EACH smartphone, tablet, video game console, computer, laptop  
12 computer, desktop computer, server, and ANY similar tangible object, device, or box that includes  
13 an operating system that can hold, store, receive, and transmit data used by YOU during the  
14 RELEVANT TIME PERIOD.

15 10. “DOCUMENT” is used in its broadest sense as allowed by the Federal Rules of  
16 Civil Procedure, and includes electronic records in any format. It includes but is not limited to  
17 original and all non-identical copies, whether by reason of marginal notes, attachments or other  
18 notes or alterations, and means, without limitation, the following items, whether printed, recorded,  
19 contained in a computer database or disk, reproduced by any other mechanical, magnetic, or  
20 electronic process or handwritten, including all drafts thereof: accounting materials, accounts,  
21 advertisements, agreements, analyses, appointment books, bills, books of account, brochures,  
22 calendars, catalogs, checks (front and back) or check stubs, claims file, computer data, computer  
23 disks, computer-generated or stored information, computer programming materials, contracts,  
24 correspondence, date books, diskettes, e-mail messages, faxes, graphs, charts, maps, diagrams,  
25 guidelines, instructions, inter-office communications, invoices, ledgers, letters, licenses, logs,  
26 manuals, memoranda, metadata, minutes, notes, opinions, pamphlets, payments, photographs,  
27 plans, pictures, press releases, projections, receipts, records, recordings, records or notes of

1 meetings or conferences, regulations, reports, sales literature, sound recordings, specifications,  
2 statements, studies, summaries or records of personal conversations or interviews, surveys,  
3 videotapes, vouchers, word processing materials (however stored or maintained) and working  
4 papers, and all other papers or writings of any character or description. The term “DOCUMENT”  
5 also includes, but is not limited to, any information contained in any computer or information  
6 retrieval devices, and any marginal comments appearing on or affixed to any document and other  
7 writings. This definition shall be construed consistent with the Federal Rules of Civil Procedure  
8 and any stipulated order concerning the Electronically Stored Information entered in this ACTION.

9 11. “EACH” shall be construed as “every,” and “every” shall be construed to include  
10 “each.”

11 12. “GAMBLE,” “GAMBLED,” and “GAMBLING” have the same meaning that YOU  
12 ascribe to these terms in the COMPLAINT.

13 13. “FORENSIC IMAGE” includes the plural and means a digital duplicate (including  
14 for example, iCloud backup, Google One backup, or local DEVICE backup or copy) of any  
15 DEVICE.

16 14. “IDENTIFY” when used with respect to a DOCUMENT shall mean to provide the  
17 following information relating to such DOCUMENT:

- 18 a) A description of the nature and contents of the DOCUMENT in such a  
19 manner that the custodian of the DOCUMENT would be able to locate it in  
20 response to a subpoena or Request;
- 21 b) The date the DOCUMENT was made or entered into and the name, address,  
22 telephone number, occupation, job title, and employer of each PERSON  
23 whose testimony could be used to authenticate such DOCUMENT and lay  
24 the foundation for its introduction into evidence;
- 25 c) The name, address, telephone number, occupation, job title, and employer of  
26 the PERSON(S) who prepared the DOCUMENT;
- 27 d) The identity of the PERSON(S) to whom the DOCUMENT was sent, and

1           21.     “RELATED TO” or “RELATING TO” means constituting, comprising, concerning,  
2 containing, mentioning, pertaining, involving, describing, depicting, discussing, commenting on,  
3 embodying, referring to, responding to, supporting, setting forth, showing, disclosing, explaining,  
4 or summarizing, either directly or indirectly, in whole or in part, as the context makes appropriate,  
5 and should be given the broadest possible scope.

6           22.     “ROBLOX” means Roblox Corporation, a Defendant in this ACTION. This term  
7 excludes any VC DEFENDANT.

8           23.     “ROBLOX PLATFORM” means the Roblox platform owned and operated by  
9 ROBLOX, whether accessed through www.roblox.com or the native Roblox mobile application for  
10 Android or iOS, Xbox, Sony PlayStation, or Meta Quest. This term excludes the VC WEBSITES.

11           24.     “VC DEFENDANTS” means Defendants Satozuki Limited B.V., Studs  
12 Entertainment Ltd., and/or RBLXWild Entertainment LLC, collectively or individually, and ANY  
13 successor entity.

14           25.     “VC WEBSITES” means Bloxmoon (bloxmoon.com), Bloxflip (bloxflip.com),  
15 RBXFlip (rbxflip.com), and/or RBLXWild (rblxwild.com), collectively or individually. The term  
16 shall also include ANY other website (excluding the ROBLOX PLATFORM) in which YOU  
17 purportedly GAMBLED using Robux.

18           26.     “YOU” and “YOUR” mean Plaintiffs Rachelle Colvin, G.D., Danielle Sass, L.C.,  
19 David L. Gentry, L.G., Osmany Rodriguez, O.R., Joshua R. Munson, D.C., J.M., T.T., R.T., Lavina  
20 Gann, and S.J. The terms “YOU” and “YOUR” shall also include ANY other individual named as  
21 a plaintiff in ANY COMPLAINT filed hereafter.

22           27.     “YOUR COUNSEL” means the attorneys who are representing or have represented  
23 YOU in this ACTION.

24           28.     The use of the singular form of any word includes the plural, and use of the plural  
25 form includes the singular form.

26           29.     The use of the present tense includes the past tense.

27           30.     For any term used herein that is not otherwise specifically defined, the common and

12. Whenever used in these Requests (including in the above Definitions), the present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. “All” means “any and all”; “any” means “any and all.” “Including” means “including but not limited to.” “And” and “or” encompass both “and” and “or.” Words in the masculine, feminine, or neutral form shall include each of the other genders.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 37:** A FORENSIC IMAGE of EACH DEVICE in YOUR possession, custody, or control that YOU (a) used to access the ROBLOX PLATFORM or (b) allegedly used to engage in GAMBLING in EACH VC WEBSITE; that is (c) limited to the portions of the FORENSIC IMAGE that show, for EACH DEVICE, EACH file relating to (i) ROBLOX; (ii) ANY VC WEBSITE; and/or (iii) ANY VC DEFENDANT.<sup>1</sup>

**REQUEST FOR PRODUCTION NO. 38:** DOCUMENTS and COMMUNICATIONS sufficient to show EACH DEVICE no longer in YOUR possession, custody, or control but that was previously in YOUR possession, custody, or control and which YOU allegedly used to engage in GAMBLING in ANY VC WEBSITE.

**REQUEST FOR PRODUCTION NO. 39:** For EACH DEVICE to which Request for Production No. 38 applies, DOCUMENTS and COMMUNICATIONS sufficient to show the date when YOU ceased to have possession, custody, or control over the DEVICE.

**REQUEST FOR PRODUCTION NO. 40:** DOCUMENTS and COMMUNICATIONS sufficient to show the date(s) on which YOU: (a) ceased to have access to EACH VC WEBSITE and (b) learned that YOU could not access EACH VC WEBSITE.

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<sup>1</sup> For clarity, a FORENSIC IMAGE of EACH DEVICE must be made and preserved, in the event there is any dispute about responsive portions of the FORENSIC IMAGE. If Plaintiffs cannot limit the FORENSIC IMAGE report to the categories set forth in RFP 37(c), Plaintiffs must produce the full FORENSIC IMAGE to Roblox, and Roblox will determine which portions are responsive.

1 YOUR behalf to ANY PUTATIVE CLASS MEMBER in this ACTION.

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3 **REQUEST FOR PRODUCTION NO. 48:** ALL DOCUMENTS and COMMUNICATIONS that YOU  
4 intend to introduce as exhibits at trial.

5 Dated: September 9, 2024

6 COOLEY LLP  
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8 KYLE C. WONG (224021)  
9 KRISTINE A. FORDERER (278745)  
10 ROBBY L.R. SALDAÑA\*  
11 KEVIN T. CARLSON\*  
12 JESSICA L. TAYLOR (339572)

13 */s/ Tiana Demas*

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15 Tiana Demas  
16 Attorneys for Defendant  
17 ROBLOX CORPORATION  
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**PROOF OF SERVICE**

I, Robby Saldaña, am a citizen of the United States and a resident of Washington, D.C. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the action. My email address is rsaldana@cooley.com and my business address is Cooley LLP, 1299 Pennsylvania Avenue, NW, Suite 700, Washington, D.C. 20004-2400. On the date set forth below I served the documents described below in the manner described below:

**DEFENDANT ROBLOX CORPORATION'S SECOND SET OF REQUESTS FOR PRODUCTION TO PLAINTIFFS**

☒ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following parties in this action:

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 Jake M. Seidman  
 Hanne Jensen  
 Ezekiel S. Wald  
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Attorneys for *Gentry* Plaintiffs

Executed on September 9, 2024, at Chicago, Illinois.

/s/ Robby L.R. Saldaña  
Robby L.R. Saldaña